



January 20, 2014

Freescal's Trade Compliance Policy

Freescal's policy is to have a comprehensive and effective Trade Compliance program to ensure we comply with all applicable export control and import laws. Our Trade Compliance program not only reflects our commitment to operate in accordance with the highest ethical standards, but also our recognition that an effective Trade Compliance program is a business imperative. Failing to meet the requirements of these laws can result in civil and criminal penalties as well as the suspension or revocation of the company's exporting or importing privileges. Such consequences can seriously impact our suppliers, our customers and our revenue. Thus, we are committed to having and continuously improving our Trade Compliance program.

The Trade Compliance program elements to achieve this policy's goals include:

Export Compliance.

- Ensuring all commodities and technology are assigned the appropriate export classification prior to any export;
- Screening all third parties to prevent the transfer of items or technology to prohibited people or places;
- Screening end uses to protect against the risk that Freescal products will be used in restricted applications;
- Having proper authority to export or re-export "controlled" items or technology. This includes having authority for in-country technology transfers to individuals, even employees, who are not citizens or permanent residents of the country where they are located; and
- Ensuring all shipping documentation accurately reflects the item(s) being shipped and the export authority for shipping it.

Import Compliance.

- Ensuring all Freescal commodities are assigned appropriate import classifications prior to any shipment;
- Ensuring all Freescal imports are declared to the Customs officials in the country of import; and
- Ensuring all import declarations accurately state the type, quantity, and value of the imported goods, as well as the country where the goods originated.

Anti-Boycott Compliance.

- Require all requests to support a trade boycott of another country to be reported to the Freescal Global Compliance Office within the Office of Business Conduct and Ethics (OBCE).
- Ensure Freescal Trade Compliance (iecgrp1@freescal.com) assesses whether requests to participate in a boycott violates applicable anti-boycott regulations or otherwise could negatively impact the company.



Gregg Lowe
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